

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 0:24-cv-60312-AHS

DVASH AVIATION HOLDINGS, LLC,

Plaintiff,

v.

AMP LEASING LIMITED,

Defendant.

/

**UNOPPOSED DEFENDANT'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

The Defendant AMP Leasing Limited (“AMP Leasing”), by and through its undersigned counsel, submits this unopposed motion pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an extension of time through Monday, January 27, 2025 for AMP Leasing to respond to the Motion for Summary Judgment [DE 36] filed by the Plaintiff Dvash Aviation Holdings, LLC (“Dvash”) (the “Unopposed Motion”). For the reasons set forth below, the Unopposed Motion should be granted.

1. On or about December 28, 2024, the Motion for Summary Judgment [DE 36] was filed with the Court.

2. The current date to respond to the Motion for Summary Judgment is Monday, January 13, 2025.

3. Undersigned counsel is in the process of reviewing and analyzing the statements contained in the Motion for Summary Judgment, together with the documents submitted by Dvash in support of the Motion for Summary Judgment, and requires an additional period of time to confer with the client, review documents, and prepare a response to the Motion for Summary

Judgment.

4. In order to do such a review of the factual and legal statements contained in the Motion for Summary Judgment and prepare the response, undersigned counsel for AMP Leasing requires an extension of time through Monday, January 27, 2025.

5. Undersigned counsel contacted counsel for Dvash regarding the relief requested in this Unopposed Motion and represents to the Court that counsel for Dvash has no objection to the extension of time requested in this Unopposed Motion.

WHEREFORE, the Defendant AMP Leasing respectfully requests that this Court grant the Unopposed Motion and extend the time for AMP Leasing to respond to the Motion for Summary Judgment through Monday, January 27, 2025, together with granting such other and further relief as to this Court appears just and proper.

Respectfully submitted,

/s/ Seth P. Robert

Seth P. Robert  
Florida Bar No. 145696  
Connis O. Brown, III  
Florida Bar No. 641960  
**BROWN ROBERT, LLP**  
150 North Federal Highway, Suite 200  
Fort Lauderdale, FL 33301  
Telephone: 954.832.9400  
Facsimile: 954.832.9430  
E-mail: [srobert@brownrobert.com](mailto:srobert@brownrobert.com)  
E-mail: [cbrown@brownrobert.com](mailto:cbrown@brownrobert.com)

*Attorneys for Defendant AMP Leasing Limited*

**Certificate of Service**

I hereby certify that on January 9, 2025 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served a copy of the foregoing upon the following:

Maurice B. VerStandig, Esq.  
The VerStandig Law Firm, LLC  
1452 W. Horizon Pkwy., #665  
Henderson, Nevada 89012  
Telephone: 301-444-4600  
E-mail: [mac@mbvesq.com](mailto:mac@mbvesq.com)  
*Attorney for Plaintiff*

*/s/ Seth P. Robert*

Seth P. Robert  
Florida Bar No. 145696